MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
Materials Management Division

GENERATOR INSPECTION

Under the Authority of Part 111, Hazardous Waste Management, Part 121, Liquid Industrial By-Products, of 1994 PA 451, as amended (NREPA), and 40 Code of Federal Regulations (CFR) 262

This document is used by EGLE inspectors and waste generators to determine compliance with Part 111 and Part 121

Facility Name_____

Inspection Date _____ Site ID# _____ WDS#_____

WASTE GENERATED	SOURCE/PROCESS	WASTE PROFILE/LDR	AMOUNT

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Waste Determination Part 111 & 40 CFR 262	C	NC	NI	NA
R 302(1) as defined in R 202	262A	A person who generates a waste shall make an accurate determination if that waste is a hazardous waste to ensure the waste is properly managed under these rules				
R 302(3)	262A	If the waste is determined to be hazardous, then both small and large quantity generators shall identify ***all*** applicable hazardous waste numbers				
R 302(4)	262A	Generator will re-evaluate waste (immediately) when materials or processes change				
R 311(1)	262D	The generator-maintained records supporting Hazardous Waste (HW) determination for not less than 3 years				

Note: The hazardous waste determination for each waste must be made at the point of waste generation, before dilution, mixing, or other alteration of the waste occurs, and at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the classification of the waste under these rules may change. Part 111, Rule 302(1)(a).

Note: Generator knowledge may be used in making the decision of waste determination. When generator knowledge is inadequate to make accurate determination, generator shall test the waste accordingly. Part 111, R 302(1)(d)(i)(ii).

Note: A small or large generator that is requested by the director to submit any of the information in Rule 311 (1) of this rule shall provide the required information within 30 days after receipt of the request.

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Generator Category Determination Part 111 & 40 CFR 262.13	C	NC	NI	NA
R 303(1) See R 303(2)-(8) for quantity determinations	262A	The generator determined its category based on the amount of hazardous waste generated each month ☐ Large Quantity Generator (LQG)				

		• > 1 kilogram (kg) (2.2 pounds) of Acute/Severely Toxic Hazardous Waste • >1,000 kg (2200 pounds/220 gallons) of Hazardous Waste • >100 kg (220 pounds) of Residues from Cleanup of Acute/Severely Toxic Hazardous Waste ☐ Small Quantity Generator (SQG) • ≤ 1 kg (2.2 pounds) of Acute/Severely Toxic Hazardous Waste • >100 kg (220 pounds/25 gallons) and < 1,000 kg (2200 pounds/220 gallons) of Hazardous Waste • ≤100 kg (220 pounds) of Residues from Cleanup of Acute/Severely Toxic Hazardous Waste				
R 311(1)	262D	The determination records must include all of the following: ☐ The type of waste and the source or process from which it was produced ☐ The chemical composition and properties of the waste and the anticipated fluctuations in its chemical composition and properties ☐ The results of any tests, sampling, waste analyses, or other determinations made under R 299.9302 ☐ Records documenting the validity and relevance of the tests, sampling, and analytical methods used, including the sampling procedure and the reasons for determining that the sample is representative of the waste and the accuracy and precision of any tests conducted				

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CITATIONS	WDS	Site Identification Numbers for Large Quantity Generators (LQGs) & Small Quantity Generators (SQGs) Part 111 & 40 CFR 262.18	C	NC	NI	NA
R 308	262A	The generator has obtained a site identification number				

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Manifest Requirements for LQGs & SQGs Part 111 & 40 CFR 262 Subpart B	C	NC	NI	NA
R309(1) (a)&(b)	262B	Generator is using an approved manifest and the manifest is completed as required				
R 309(1)(c)	262B	Generator is utilizing e-manifesting instead of a paper manifest, as required under 40 CFR 3.10 and 262.24				
R 309(1)(d)	262B	The generator uses a permitted transporter				
R 311(3)	262D	Generator has a copy of each manifest signed for 3 years, or until receives a signed copy from the designated facility that received the waste				
R 312(4)(a)	262D	For manifests not received from the designated facility within 35 days, the **LQG** has contacted the transporter and the designated facility				
R 312(4)(b)	262D	For manifests not received from the designated facility within 45 days, the **LQG** has submitted the exception report to the director				

R 312(5)	262D	For manifests not received from the designated facility within 60 days, the **SQG** has submitted legible copy of the manifests with description of the issue to the director.				

Note: The Generator must be registered via the Resource Conservation and Recovery Act of 1976, as amended, info to utilize e-manifesting.

Note: The electronic signature methods for the e-manifest system must be methods that are designed and implemented in a manner that the Environmental Protection Agency (EPA) considers to be as cost-effective and practical as possible for the user of the manifest. An electronic signature must be a legally valid and enforceable signature under applicable EPA and other federal requirements pertaining to electronic signatures. R 309(2)

Note: SQGs' are exempt from manifesting requirements if the waste is reclaimed under a contractual agreement that specifies the type of waste and to deliver the regenerated material back to the generator R 309(3), i.e., tolling agreement.

Note: Generators are exempt from manifesting requirements when transporting hazardous waste shipments on a public or private right-of-way within, or along, the border of contiguous property under the control of the generator, even if the property is contiguous property divided by a public or private right-of-way.

Note: The LQG Exception Report must include both of the following:
- A legible copy of the manifest for which the generator does not have confirmation of delivery.
- A cover letter signed by the generator, or the generator's authorized representative, explaining the efforts taken to locate the hazardous waste and the results of those efforts.

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CITATIONS	WDS	Land Disposal Restrictions (LDR) for LQGs & SQGs Part 111 Rule 313 & 40 CFR 268.7	C	NC	NI	NA
R 313 and 40 CFR 268	268A	Generator has an LDR for each waste for which land disposal is prohibited				
		An LDR matches with a waste characterization/profile for each HW stream				
		Each manifested HW has LDR documentation (at least one-time certification or LDR documentation with each manifest)				
268.7(a)(6)	268A	All documentation supporting LDR determination, either by knowledge or testing, is available for review, and maintained for at least 3 years				
268.7(a)(8)	268A	Generator has maintained a copy of all notices, certifications, and other documents related to LDR process for at least 3 years				

Note: R 307(2) for LQGs and R 306(1)(e) for SQGs refers to 40 CFR 268

Note: Refer to Generator Paperwork Requirements table for 40 CFR 268.7(a)(2)-(4) & (9)

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Waste Minimization Certification for LQGs & SQGs 40 CFR 262.27	C	NC	NI	NA
262.27 (a) (b)		The generator that has shipped hazardous waste has certified to one of the following statements: ☐ "I am an LQG. I have a program in place to reduce the volume and toxicity of waste generated to the degree that I have determined to be economically practicable, and I have selected the practicable method of treatment, storage, or disposal currently available to me,				

		which minimizes the present and future threat to human health and the environment." ☐ "I am an SQG. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."				

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Recordkeeping/Reporting for LQGs & SQGs Part 111 & 40 CFR 262 Subpart D	C	NC	NI	NA
R 308(5)	262A	SQG re-notified the year in which the re-notifications are required, and every 4 years thereafter, by September 1				
R 308(6)	262A	LQG re-notified by March 1 of each even-numbered year; submits with the biennial report				
R 311(7)	262D	The generators keep documentation of all inspections, training, and other records, as required, for not less than 3 years				
R 312(1)	262D	LQGs submitted biennial report by March 1 of each even-numbered year for waste generated in the previous odd year; maintains report for not less than 3 years				
R 312(2)	262D	LQGs receiving Very Small Quantity Generator (VSQG) waste has submitted biennial report by March 1 of each even-numbered year for waste generated in the previous odd year				

Note: The periods of retention referred to in this rule are extended automatically during any unresolved enforcement action regarding the regulated activity, or as requested by the EGLE director; Rule 311(8)

Satellite and Process Area	Hazardous waste #/Chemical Name	Size of Container

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Satellite Accumulation Area (SAA) Part 111 Rule 305 & 40 CFR 262.15	C	NC	NI	NA
R 305(1)	262C	The container meets all the following conditions: ☐ At or near the point of generation ☐ Under the control of the operator ☐ No more than 55 gallons or 1 quart acutely/severely toxic				
R 305(1)(a)	262C	Containers are in good condition				
R 305(1)(b) and (c)(i)-(iii)	262C	Containers are compatible with the waste stored in them unless the requirements of 40 CFR 265.17(b) are met				
R 305(1)(d)	262C	Containers holding hazardous waste are closed except for adding, removing, or consolidating or if temporary venting is necessary				

R 305(1)(e)(i)(ii)	262C	Generator labeled the container with ☐ The words "Hazardous Waste" ☐ The hazardous waste number or description of the waste, such as the chemical name ☐ Indication of the hazards of the contents, such as waste characteristics, hazard statement or pictogram, or National Fire Protection Association (NFPA) chemical hazard label *Note: SAA container labeling requirements are the same as SQG and LQG labeling*				
R 305(2)	262C	When the SAA exceeds 55 gallons or 1 quart of acutely/severely toxic hazardous waste, the generator must do the following with the excess waste: ☐ Within 3 calendar days, moved the hazardous waste to a central accumulation area, as required in R 306(1) (b-r) **OR** ☐ Within 3 calendar days, remove the hazardous waste to an onsite interim status or licensed treatment, storage, or disposal facility **OR** ☐ Within 3 calendar days, remove the hazardous waste to an off-site designated facility				
R 305(2)(c)	262C	Within 3 calendar days, the generator marked the container with date the excess amount began accumulating				
R 305(3)	262C	SAAs operated by SQG have met the provisions of R 306 (1)(f)-(r) (Conditions for SQG Accumulation of Waste, see table below)				
R 305(4)	262C	SAAs operated by LQG have met the provisions of 40 CFR 262, Subpart M (Preparedness, prevention, and emergency procedures for LQGs)				

Accumulation Area Locations	Comments

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Conditions for SQG Accumulation of Waste Part 111 Rule 306 & 40 CFR 262.16	C	NC	NI	NA
R 306(1)(b)	262C	☐ SQG accumulates hazardous waste onsite for no more than 180 days unless in compliance with any of the following [R 306(2),(3), (4), or (5)]: ☐ SQG transporting waste 200 miles or more for offsite treatment, storage, or disposal may accumulate hazardous waste onsite for 270 days or less				

		☐ SQG may accumulate waste for more than 180 days or 270 days due to unforeseen, temporary, and uncontrollable circumstances, if granted a 30-day extension by the director or designee ☐ SQG that receives a shipment back as a rejected load or residue in accordance with the manifest discrepancy provisions of R 299.9608 may accumulate the returned waste onsite in accordance with subrule (1) to (3) ☐ SQG experiencing an episodic event may accumulate hazardous waste in accordance with R 299.9316 instead of LQG requirements (R 299.9307)				
R 306(1)(c)	262C	The quantity of hazardous waste accumulated onsite never exceeds 6,000 kg				
R 306(1)(d)(i) and CFR 264.175(a), (b), (c), and (d)	262C	Container accumulations of greater than 1000 kg and less than 6000 kg must meet the secondary containment requirements of 40 CFR 264.175: Container accumulation of free liquids and/or F020, F021, F022, F023, F026, F027 must meet the following conditions: ☐ The base must have no cracks or gaps **AND** is impervious TO contain leaks, spills, and precipitation ☐ The base is sloped, drained to separate containment, or containers are elevated to prevent contact with accumulated liquids ☐ Containment capacity of 10% of the total of all containers or 100% of the largest container, whichever is greater (only free liquid containers are counted) ☐ Run-on is prevented unless the containment system has sufficient excess capacity ☐ Spilled or leaked waste and accumulated precipitation is removed from the system in a timely manner and prevents overflow ☐ Containment systems that do not accumulate free liquids or F wastes listed above must be sloped, drained to separate containment, or containers are elevated to prevent contact with accumulated liquids				
R 306(1)(d)(i)(A)	262C	The hazardous waste container is in good condition and does not leak				
R 306(1)(d)(i)(B)	262C	The container is made of, or lined with, material that will not react with and are compatible with the hazardous waste				
R 306(1)(d)(i)(C)	262C	Containers holding hazardous waste should always be closed, except when adding or removing waste				
R 306(1)(d)(i)(D)	262C	Hazardous waste containers are handled/stored to prevent leak or rupture				
R 306(1)(d)(i)(E)	262C	Accumulation areas are inspected at least weekly for leaking containers				
R 306(1)(d)(i)(F)	262C	Containers are compatible with the waste stored in them, unless the requirements of 40 CFR 265.17(b) are met, and containers of				

		incompatible wastes are separated by a dike, berm, wall, or other device				
R 306(1)(d)(i) (G)(1)-(3)	262C	Generator labeled the container with: ☐ The words “Hazardous Waste” ☐ The hazardous waste number, or description of the waste, such as the chemical name ☐ Indication of the hazards of the contents, such as waste characteristics, hazard statement or pictogram, or NFPA chemical hazard label ☐ The date when the accumulation began marked clearly visible				
R 306(1)(d)(ii)	262C	NOTE: SQG waste accumulated in tanks complete “Tank Inspection Form”				
R 306(1)(d)(iii)	262C	NOTE: SQG waste placed on a drip pad complete “Drip Pad Inspection Form”				
R 306(1)(f)	262C	The SQG operates the site in a way that minimizes the possibility of a fire, explosion, or release of hazardous waste to air, soil, or surface water				
R 306(1)(g) (i)-(iv)	262C	All areas where hazardous waste is either generated or accumulated must be equipped with all the items specified. An SQG shall determine the most appropriate locations to locate specified equipment necessary to prepare for and respond to emergencies: ☐ An internal communications or alarm system ☐ A device, such as a telephone, immediately available at the scene of operations, or a hand-held, two-way radio ☐ Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment ☐ Water at adequate volume, or foam producing equipment				
R 306(1)(h)	262C	SQG has tested and maintained emergency equipment to assure operation				
R 306(1)(i)-(j)	262C	When waste is being handled, the SQG has provided immediate and unimpeded access to internal alarms or emergency communication devices, either directly or through visual or voice contact with another employee. If only one employee is on the premises during operations, that employee must have immediate unimpeded access to a device, such as a telephone or a hand-held, two-way radio, capable of summoning external emergency assistance, unless a device is not required under subdivision (g) of this subrule.				
R 306(1)(k)	262C	SQG maintains aisle space for unobstructed movement of personnel/emergency equipment				
R 306(1)(l)	262C	SQG shall attempt to make arrangements with local authorities and maintains records documenting the arrangement or attempt				
R 306(1)(m)	262C	SQG has identified at least one employee who is responsible for coordinating emergency responses				

R 306(1)(n)	262C	SQG must post next to telephones, or in areas directly involved in the generation and accumulation of hazardous waste, the following: ☐ Name & phone number of the emergency coordinator ☐ Location of fire extinguishers and spill control material, and, if present, fire alarm ☐ Phone number of the fire department, unless the site has a direct alarm				
R 306(1)(o)	262C	Employees are familiar with proper waste handling and emergency procedures				
R 306(1)(p)	262C	In an emergency event, the emergency coordinator responded as needed, contacted Pollution Emergency Alerting System and the national response center if release reached surface or ground water				
R 306(1)(q)	262C	Hazardous waste accumulation is protected from weather, fire, physical damage, and vandals				
R 306(1)(r)	262C	Hazardous waste accumulated so hazardous waste or hazardous waste constituents cannot escape by gravity into the soil, directly or indirectly, into surface or groundwaters, or into drains or sewers and so that fugitive emissions are not in violation of Part 55 of the act				

Note: Unless none of the hazards posed by waste handled at the SQG's site could require a particular kind of specified equipment, or the actual waste generation or accumulation area does not lend itself for safety reasons to have a particular kind of specified equipment.

Note: If the employee is the emergency coordinator and, if on call, should be available to respond to an emergency by reaching the generator's site within a short period of time.

Note: 40 CFR 262, Subpart M, applies to the areas of a LQG where hazardous waste is generated or accumulated onsite.

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Emergency Procedures for LQGs Part 111 R307(1)(c) & 40 CFR 262 Subpart M	C	NC	NI	NA
CFR 262.251	262C	Generator maintains and operates the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, which could threaten human health or the environment				
CFR 262.252	262C	Where hazardous waste is generated or accumulated, the generator must be equipped with the following items. **NOTE**: Unless the type of waste does not require a particular kind of equipment or the accumulation area cannot include particular equipment due to safety reasons. The generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies. ☐ An internal communications or alarm system ☐ A device, such as a telephone, immediately available at the scene of operations, or a handheld, two-way radio				

		☐ Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment ☐ Water at adequate volume or foam producing equipment				
CFR 262.253	262C	The generator has tested and maintained emergency equipment to assure proper operation during emergency				
CFR 262.254	262C	Whenever hazardous waste is being handled, all personnel have immediate (direct or unimpeded) access to an alarm or emergency communication device, either directly or through visual or voice contact, with another employee. **NOTE**: If there is one employee on the premises when operating, that employee must have immediate access to a device capable of summoning external assistance.				
CFR 262.255	262C	Generator maintains aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to *any area* of facility operation in an emergency				
CFR 262.256(a)	262C	The generator must attempt to make arrangements with the appropriate local emergency authorities				
CFR 262.256(b)	262C	The generator maintains documentation of the attempt to make arrangements or of the actual arrangements made with the local emergency authorities				

CITATIONS	WDS	LQG Contingency Plan 40 CFR 262.260-263	C	NC	NI	NA
CFR 262.260(a)	262C	The generator maintains a Contingency Plan for the facility. The Contingency Plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.				
CFR 262.260(b)	262C	The Contingency Plan is carried out immediately whenever there is a fire, explosion, or release of hazardous waste				
CFR 262.261(a)-(f)	262C	The Contingency Plan: ☐ Describes the actions facility personnel must take to comply with §§262.260 and 262.265 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility ☐ May be combined with Spill Prevention, Control, and Countermeasure Plan or other regulatory standard plans ☐ Describes the arrangements made with the local authorities ☐ Lists names and emergency telephone numbers of qualified emergency coordinators ☐ Lists all emergency equipment, including location, physical description, and capabilities ☐ Includes evacuation plan for personnel with signal(s), evacuation routes, and alternate routes				
CFR 262.262(a)	262C	A copy of the Contingency Plan, and all revisions, are maintained at the facility, and has submitted the plan and revisions to all local authorities				

CFR 262.262(b)	262C	The generator has submitted a Quick Reference Guide of the Contingency Plan to all local authorities. The Quick Reference Guide includes all of the following: ☐ The types/names of hazardous wastes, in layman's terms, and the associated hazard associated with each hazardous waste present at any one time (i.e., toxic paint wastes, spent ignitable solvent, corrosive acid) ☐ The estimated maximum amount of each hazardous waste that may be present at any one time ☐ The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff ☐ A map of the facility showing where hazardous wastes are generated, accumulated, and treated, and routes for accessing these wastes ☐ A street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the facility and also evacuate citizens and workers ☐ The locations of water supply (i.e., fire hydrant and its flow rate) ☐ The identification of onsite notification systems (i.e., a fire alarm that rings offsite, smoke alarms) ☐ The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator *Note: LQG first becomes subject to the Quick Reference Guide requirements after May 30, 2017, or a LQG that is otherwise amending its Contingency Plan must, at that time, submit a Quick Reference Guide of the Contingency Plan to the local emergency responders*				
CFR 262.263	262C	The Contingency Plan has been reviewed and amended, as necessary. *Date Contingency Plan was amended:*				
CFR 262.264	262C	The emergency coordinator is ☐ familiar with the facility's operations and emergency procedures and ☐ has the authority to carry out the Contingency Plan *List emergency coordinator:*				
CFR 262.265	262C	If emergency occurred, the emergency coordinator followed the emergency procedures				
R307(1)(c)(i)-(viii)	262C	If a fire, explosion, or other release of hazardous waste could threaten human health or environment, or knowledge of spill that reached surface or groundwater, the generator notified the Department of Environment, Great Lakes, and Energy, as required				

Note: Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. In situations where the generator facility has an emergency coordinator continuously on duty, because it operates 24-hours per day every day of the year, the Contingency Plan may list the staffed position (i.e., operations manager, shift coordinator, shift operations supervisor), as well as an emergency telephone number that can be guaranteed to be answered at all times.

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CITATIONS	WDS	Training Requirements for LQG's Part 111 Rule 307 & 40 CFR 262.17	C	NC	NI	NA
R307(1)(f)	262C	Personnel have successfully completed a program that taught them to perform their duties relevant to the positions in which they are employed to ensure: ☐ Compliance with these rules ☐ Contingency Plan implementation ☐ Personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. **NOTE**: For employees that receive emergency response training under 29 CFR 1910.120(p)(8) and 1910.120(q), the LQG is not required to provide separate emergency response training under this rule if that the overall training meets all of the conditions of exemption in this rule (R307(1)(g)).				
R307(1)(f)	262C	The program is given by a person trained in hazardous waste management procedures.				
R307(1)(h)	262C	Personnel have completed the training program within 6 months of hire and takes part in an annual review of the training requirements. Date/s of most recent annual training_____				
R307(1)(i)(i)-(iv)	262C	The generator maintains all of the following documents and records onsite regarding training related to hazardous waste management positions: ☐ Job title for each position at the site ☐ The name of each employee filling each job ☐ A written job description for each position ☐ A written description of the type and amount of both introductory and continuing training that was given to personnel ☐ Record of training *Note: The job description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of personnel assigned to each position*				
R307(1)(j)	262C	Training records of current personnel are maintained onsite until closure. *Note: Personnel training records may accompany personnel transferred within the same company.*				
R307(1)(j)	262C	Training records of former employees are maintained for at least 3 years from the date last worked.				

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Accumulation Requirements for LQG's Part 111 Rule 307 & 40 CFR 262.17	C	NC	NI	NA
R307(1)(a)	262C	Generator accumulates hazardous waste onsite for no more than 90 days **OR** ☐ the generator has requested and has been granted an additional 30-day extension under R307(2) **OR** ☐ the generator accumulates F006 waste for metal recovery from electroplating treatment sludges, and complies with the conditions for longer accumulation time or quantity under R307(3), (4), or (5)				
R307(1)(b)(i)(A) and CFR	262C	Containment system meets the requirements of 40 CFR 264.175 and the applicable requirements of 40 CFR part 265**, subparts AA, BB,**				

264.175(a), (b), and (d)		**and CC (Air Emission Standards on separate form)**; Container accumulation of free liquids and/or F020, F021, F022, F023, F026, F027 must meet the following conditions: ☐ The base must have no cracks or gaps **AND** is impervious, TO contain leaks, spills, and precipitation ☐ The base is sloped, drained to separate containment, or containers are elevated to prevent contact with accumulated liquids ☐ Containment capacity of 10% of the total of all containers or 100% of the largest container, whichever is greater (only free liquid containers are counted) ☐ Run-on is prevented, unless the containment system has sufficient excess capacity ☐ Spilled or leaked waste and accumulated precipitation is removed from the system in a timely manner and prevents overflow				
R307(1)(b)(i)(A) and CFR 264.175(c)	262C	Containment systems that do not accumulate free liquids or F-wastes listed above must be sloped, drained to separate containment, or containers are elevated to prevent contact with accumulated liquids				
R307(1)(b)(i)(B)	262C	The hazardous waste container is in good condition and does not leak				
R307(1)(b)(i)(C)	262C	The container is made of, or lined with, material that will not react with, and are compatible with, the hazardous waste				
R307(1)(b)(i)(D)	262C	Containers holding hazardous waste should always be closed, except when adding or removing waste				
R307(1)(b)(i)(E)	262C	Hazardous waste containers are handled/stored to prevent leak or rupture				
R307(1)(b)(i)(F)	262C	Accumulation areas are inspected at least weekly for leaking containers				
R307(1)(b)(G)(I)	262C	Containers holding ignitable or reactive waste are located 15 meters (50 feet), or have written approval obtained from the local fire code authority				
R307(1)(b)(G)(II)	262C	The generator has taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste				
R307(1)(b)(H)(I)	262C	Incompatible waste is not placed in the same container				
R307(1)(b)(H)(II)	262C	Hazardous waste is not put in unwashed containers that previously held incompatible waste				
R307(1)(b)(H)(III)	262C	Incompatible wastes are separated/protected from each other by physical barriers or enough distance				
R307(1)(b)(I)(I)-(III)	262C	Generator labeled the container: ☒ The words “Hazardous Waste” ☐ The hazardous waste number or description of the waste, such as the chemical name ☐ Indications of the hazards of the contents, sch as waste characteristics, hazard statement of pictogram, or NFPA chemical hazard label ☐ The date when the accumulation began and was visible				

Accumulation Area Locations	Comments

Note: Reactive/ignitable waste must be separated and protected from sources of ignition or reaction including, but not limited to, the following: open flames, smoking, cutting, welding, hot surfaces, frictional heat, sparks, spontaneous ignition, and radiant heat. While ignitable or reactive waste is being handled, the LQG shall confine smoking and open flame to specially designated locations. "No smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Note: The indication of the hazards of the contents may include the applicable hazardous waste characteristic(s), the hazard communication consistent with 49 C.F.R. part 172, subpart E or subpart F, a hazard statement or pictogram consistent the 29 C.F.R. §1910.1200, or a chemical hazard label consistent with the NFPA standard number 704

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	F006 Requirements for LQG's Part 111 Rule 307 & 40 CFR 262.17	C	NC	NI	NA
R307(3)(a)-(d) and (4)	262C	Generator accumulates F006 waste onsite more than 90 days (180 days max R307(3)) or if must be transported 200 miles or more (270 days max R307(4)) if all the following requirements are met: ☐ Pollution prevention practices that reduce the amount of F006 containments before recycling ☐ F006 waste is legitimately recycled via metals recovery ☐ No more than 20,000 Kg of F006 is accumulated at any one time ☐ F006 meets the container and tank requirements as stated R307(3)(d)(i)-(iv)				
(5)	262C	Generator accumulates F006 waste in accordance with R307(3) or (4) and has been granted an extension of 30 days or an exception to the 20,000-kg limit of F006 waste by the director				

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	LQG's Accepting VSQG Waste Part 111 Rule 307 & 40 CFR 262.17	C	NC	NI	NA
R307(6)	262C	Generator has "control" of the VSQG to receive and accumulate the waste				
R307(6)(a)	262C	Generator has notified 30 days before receiving VSQG waste on the EQP5150 and within 30 days of the VSQG changing name or site address				
R307(6)(b)	262C	Generator maintains records of VSQG waste shipments for 3 years from date waste was received. Records must identify: ☐ VSQG name ☐ Site address ☐ Contact information ☐ Description of the hazardous waste received ☐ Quantity ☐ Date received				
R307(6)(c)	262C	Generator has labeled each container or unit with the date accumulation started; the date the hazardous waste was received from the VSQG				

		Note: If the generator is consolidating incoming hazardous waste from a VSQG with either its own hazardous waste, or with hazardous waste from other VSQGs, the generator shall label each container or unit with the earliest date any hazardous waste in the container was accumulated onsite.				

Note: "Control" means the power to direct the policies of the generator, whether by the ownership of stock, voting rights, or otherwise, except that contractors who operate generator facilities on behalf of a different person are not considered to "control" the generators.

Note: Generator complies with the independent requirements identified in R 299.9301(1)(c) (R302, R303, R308-R312, R314) and the conditions for exemption in this rule for all hazardous waste received from a VSQG.

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATIONS	WDS	Closure Requirements for LQG's Part 111 Rule 307 & 40 CFR 262.17	C	NC	NI	NA
R307(1)(k)(i)(A)-(B)	262C	Generator has closed an individual unit and has placed a notice in the operating record within 30 days after closure, identifying the location of the unit OR meet the closure standards of (iii) for tanks and (iv) for drip pads.				
R307(1)(k)(ii)(A)-(B)	262C	Generator closing all units must meet all the following requirements: ☐ Submitted the EQP5150 no later than 30 days before closure ☐ Notified via EQP5150 within 90 days after closure has been completed				
R307(1)(k)(iii)(A)-(C)	262C	At closure, each unit has done all of the following: ☐ Minimized the need for further maintenance by controlling, minimizing, or eliminating, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste ☐ Removed or decontaminated all contaminated equipment, structures, and soil, and any remaining hazardous waste residues from the unit, including containment system components, contaminated soils and subsoils, bases, and structures and equipment contaminated with waste ☐ Any hazardous waste generated in the process of closing the unit is managed, as required under Part 111				

Note: If the unit is subsequently reopened, the quantity generator may remove the notice from the operating record R307(1)(k)(i)(B).

Note: If additional time is needed to clean close all of the units, the generator must notify by using the EQP5150 within 75 days after the date provided in subparagraph, and provide an explanation as to why the additional time is required R307(1)k)(ii)(C).

Note: If the generator demonstrates that any contaminated soils and wastes cannot be practicably removed or decontaminated, as required, then the unit is considered a landfill. For the purposes of closure, post closure, and financial responsibility, generator shall close the unit and perform postclosure care in accordance with 40 CFR 265.310 and comply with the requirements for landfills specified in 40 CFR part 265, subparts G and H, (R307(1)(k)(iii)(D)).

Note: Closure requirements do not apply to satellite accumulation areas (R307(1)(k)(v)).

Units Closed	Comments (i.e., date of closure, type of unit accumulation area or tank)

(C – Compliant; NC – Not Compliant; NI - Not Inspected; N/A - Not Applicable)

CITATION(S)	WDS	EPISODIC GENERATION FOR SQG (Part 111 & 40 CFR 262)	C	NC	NI	NA
R 316(2)(b) 262.232(a)(2)	262C	Generator notified the director no more than 30 calendar days prior to initiating a **planned episodic** event using form EQP5150.				
R 316(2)(b) 262.232(a)(2)	262C	Generator notified the director via phone, email, or fax within 72 hours of an **unplanned episodic** event using form EQP5150.				
R 316(2)(b) 262.232(a)(2)	262C	Generator included the following in the notification: ☐ The start date and end date of the episodic event ☐ The reason(s) for the event ☐ The types and estimated quantities of hazardous waste expected to be generated as a result of the episodic event ☐ A facility contact and emergency coordinator with 24-hour telephone access to discuss the notification submittal or respond to an emergency, in compliance with Rule 306(1)(n)				
R 316(2)(e)(B)(1-3) 262.232 (a)(4)(i)(A-C)	262C	Generator labeled/marked containers with the following: ☐ The words “Episodic Hazardous Waste” (R 316 (2)(e)(i)(B)(1); 262.232 (a)(4)(i)(A)) ☐ An indication of the hazards of the contents; hazard communication consistent with the Department of Transportation (DOT) requirements (placarding or labeling); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard; or a chemical hazard label consistent with the NFPA (R 316 (2)(e)(i)(B)(2); 262.232 (a)(4)(i)(B)) ☐ The date upon which the episodic event began (R 316 (2)(e)(i)(B)(3); 262.232 (a)(4)(i)(C))				
R 316(e)(ii) 262.232 (a)(4)(ii)	262C	If waste was accumulated in tanks, generator complied with the following: ☐ Labeled or marked tank with the words “Episodic Hazardous Waste” (R 316 (2)(e)(ii)(B)(I); 262.232 (a)(4)(ii)(A)) ☐ Labeled or marked tank with the hazardous waste number and an indication of the hazards of the contents (R 316 (2)(e)(ii)(B)(II); 262.232 (a)(4)(ii)(B))				

		☐ Marked with hazard communication consistent with the Michigan DOT requirements, a pictogram consistent with Global Harmonization Standard for worker protection, or markings consistent with the NFPA chemical hazard labels (R 316 (2)(e)(ii)(B)(II); 262.232 (a)(4)(ii)(B)) ☐ Used inventory logs, monitoring equipment, or other records to identify the date upon which each episodic event begins (R 16 (2)(e)(ii)(C); 262.232 (a)(4)(ii)(C)) ☐ Kept inventory logs or records with the above information onsite and readily available for review (R 316 (2)(e)(ii)(D); 262.232 (a)(4)(ii)(D))				
R 316 (2)(e)(iii) 262.232 (a)(4)(iii)	262C	Generator ensured that hazardous waste was managed in a manner that minimizes the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to the air, soil, or water, which could threaten human health or the environment				
R 316(2)(f) 262.232 (a)(5)	262C	Generator complied with the hazardous waste manifest requirements when it sent episodic event hazardous waste offsite to a designated facility				
R 316(2)(g) 262.232(a)(7)	262C	Generator maintained all of the following records for 3 years from the end date of the episodic event: ☐ The beginning and end dates of the episodic event (Rule 316 (2)(g)(i); 262.232 (a)(7)(i)) ☐ A description of the episodic event (Rule 316 (2)(g)(ii); 262.232(a)(7)(ii)) ☐ A description of the types and quantities of hazardous wastes generated during the event (Rule 316 (2)(g)(iii); 262.232 (a)(7)(iii)) ☐ A description of how the hazardous waste was managed, as well as the name of the designated facility that received the hazardous waste (Rule 316 (2)(g)(iv); 262.232 (a)(7)(iv)) ☐ The name of hazardous waste transporters (Rule 316 (2)(g)(v); 262.232 (a)(7)(v)) ☐ An approval letter from the director if the generator petitioned to conduct one additional episodic event per calendar year (Rule 316 (2)(g)(vi); 262.232 (a)(7)(vi))				

NOTE: SQGs are limited to one episodic event per calendar year; however, the generator may petition the department for a second episodic event. The second episodic event cannot be the same as the first episodic event (if the first event was planned, the second must be unplanned and vice versa).

NOTE: Hazardous waste managed as part of an episodic event does not have to be counted toward a generator's category (40 CFR 262.13(c)(8)).

NOTE: Accumulation during an episodic event must not exceed 6,000 kg of non-acute hazardous waste. If the accumulation is expected to exceed 6,000 kg of nonacute hazardous waste, the VSQG must comply with all of the conditions for an LQG. Failure to do so will risk the VSQG becoming the operator of a non-exempt storage facility.

NOTE: Treatment is not allowed by SQGs (except in onsite elementary unit).

NOTE: Hazardous wastes on drip pads and in containment buildings cannot be managed under subpart L.

NOTE: The generator has up to 60-calendar days from the start of the episodic event to manifest and send its hazardous waste generated from the episodic event to a designated facility. If the 60-calendar days is exceeded, that waste counts towards the generator's category and must be managed under the regulations for that generator category.

NOTES: